

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

MORTON MILLER and  
PETER SADKHIN

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No. 10 CR 462

Judge Suzanne B. Conlon

**AGREED PROTECTIVE ORDER**

The government has filed an agreed motion for a protective order. The government's motion is GRANTED, and it is hereby ORDERED as follows:

1. All materials produced by the government in preparation for, or in connection with, any stage of the proceedings in this case, including but not limited to agency reports, audio recordings, transcripts of the same, witness statements, memoranda of interview, grand jury transcripts, and primary documents, to include employee personnel files, hospital, patient and insurance records, bank records, insurance claims data, financial and tax records, and any other documents and/or tangible objects produced by the government (collectively, "discovery material"), shall remain the property of the United States. Upon conclusion of a trial and any appeals of this case or any earlier resolution of charges against the defendants, the discovery material and all copies made thereof shall either be destroyed or maintained under secure conditions by defense counsel, unless there is a specific request by the government for the return of those particular documents.

2. Any discovery material provided by the United States may be used by the defendants and their counsel solely in connection with the defense of this case and for no other purpose and in connection with no other proceeding. Discovery materials and the contents thereof shall not be disclosed either directly or indirectly to any person or entity other than the defendants, defendants'

counsel, persons assisting in the defense, persons who are interviewed (as potential witnesses) or consulted (as potential experts) during the course of the investigation of this case, or such other categories of persons preapproved by the government or persons to whom the Court may authorize disclosure, and all persons who receive discovery material must be given notice of this Order and advised that they can only use the materials under the terms of this Order.

3. Discovery material shall not be filed with the Clerk of Court unless it has been appropriately redacted to remove sensitive information, including bank account numbers and personal identifying information.

4. The restrictions set forth in this order do not apply to documents that are (or become) public record, including but not limited to, trial transcripts, documents that have been received in evidence at other trials, or documents that are otherwise properly placed in the public domain. The parties agree, however, that they shall take all necessary steps to maintain patient anonymity.

5. Each party reserves all other rights relating to discovery and the production of documents, including the right to petition the Court to construe, modify, or enforce this Order upon proper notice. The Court retains jurisdiction to resolve any disputes regarding this Order.

ENTER:



SUZANNE B. CONLON  
United States District Judge

Date: 6/15/2010